

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

2016 OCT -6 PM 1:38

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

Case No.: 3:16-cv-01735-D

CHRISTOPHER A. FAULKNER,  
BREITLING ENERGY CORPORATION,  
JEREMY S. WAGERS,  
JUDSON F. ("RICK") HOOVER,  
PARKER R. HALLAM,  
JOSEPH SIMO,  
DUSTIN MICHAEL MILLER RODRIGUEZ,  
BETH C. HANDKINS,  
GILBERT STEEDLEY,  
BREITLING OIL & GAS CORPORATION,  
CRUDE ENERGY, LLC,  
PATRIOT ENERGY, INC.,

Defendants,

And

TAMRA M. FREEDMAN and  
JETMIR AHMEDI,

Relief Defendants.

JURY TRIAL DEMANDED

**DEFENDANT BREITLING OIL AND GAS CORPORATION'S ANSWER  
TO PLAINTIFF'S FIRST AMENDED COMPLAINT**

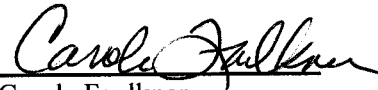
TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE:

Defendant Breitling Oil and Gas Corporation ("Breitling Oil and Gas"), hereby submits their Answer to Plaintiff's First Amended Complaint in the above-styled and numbered cause as follows:

1. Pursuant to Federal Rule of Civil Procedure 8(b)(3), Defendant Breitling Oil and Gas denies generally the allegations contained in Plaintiff's First Amended Original Complaint.

**THEREFORE**, Breitling Oil and Gas Corporation requests that Plaintiff take nothing on its claims, that Defendant recover its costs, and for such other and further relief, at law or in equity, to which Defendant may be justly entitled.

Respectfully submitted,



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Attorney for Defendant Breitling  
Oil and Gas Corporation

**CERTIFICATE OF  
SERVICE**

I hereby certify that on October 6, 2016 I filed the foregoing via personal deliver to the Court's offices. I further certify that I served a true and correct copy of the foregoing document via federal express and electronic mail on all parties and/or their counsel as detailed below:

Christopher A. Faulkner 1910 Pacific Avenue Suite 12000 Dallas, TX 75201 <a href="mailto:Chris@breitlingenergy.com">Chris@breitlingenergy.com</a> <i>Defendant Pro Se</i>	Christopher A. Faulkner 1910 Pacific Avenue Suite 12000 Dallas, TX 75201 <a href="mailto:Chris@breitlingenergy.com">Chris@breitlingenergy.com</a> <i>Registered Agent for Defendant Breitling Oil &amp; Gas</i>
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<p>Alex More (requested email service only)                  Carrington Coleman                  901 Main St., Suite 5500                  Dallas, TX 75202  <a href="mailto:amore@CCSB.com">amore@CCSB.com</a>  <i>Counsel for Defendant Gilbert R. Steedley</i></p>	<p>Lance Pool Friedman &amp; Feiger                  5301 Spring Valley Road Suite 200                  Dallas, TX 75254 <a href="mailto:lpool@fflawoffice.com">lpool@fflawoffice.com</a>  <i>Counsel for Breitling Energy Corp.</i></p>
<p>Karen Cook, PLLC                  Karen Cook                  700 Park Seventeen Tower                  1717 McKinney Ave.                  Dallas, TX 75202  <a href="mailto:Karen@karencooklaw.com">Karen@karencooklaw.com</a>  <i>Counsel for Defendants Parker R. Hallam                  Crude Energy, LLC</i></p>	<p>Michael P. Gibson                  Burleson, Pate &amp; Gibson, LLP Founders Square                  900 Jackson St., Suite 330                  Dallas, TX 75202 <a href="mailto:mgibson@bp-g.com">mgibson@bp-g.com</a> <i>Counsel                  for Beth C. Hankins</i></p>
<p>B. David Fraser, Sr.                  US Securities and Exchange Commission                  Burnett Plaza Suite 1900                  801 Cherry Street, Unit #18                  Fort, Worth, TX 76102  <a href="mailto:FraserB@SEC.gov">FraserB@SEC.gov</a>  <i>Counsel for US Securities and Exchange                  Commission</i></p>	<p>Jeffrey J Ansley                  Bell Nunnally &amp; Martin LLP                  3232 McKinney Avenue, Suite 1400                  Dallas, TX 75204</p>
<p>Richard B Roper , III                  Thompson &amp; Knight LLP                  1722 Routh St                  Suite 1500                  Dallas, TX 75201</p>	<p>Robert R Smith                  Fitzpatrick Hagood Smith &amp; Uhl LLP                  2515 McKinney Avenue, Suite 1400                  Dallas, TX 75201</p>

*Carole Spilker*